court of the City of Manila. Abolished have been the tribal ward courts, the court of customs appeal, and the land registration court, the latter for unconvincing reasons. The Chief Justice and the Justices of the Supreme Court have been appointed by the President of the United States with the advice and consent of the United States Senate. The other judges have been appointed by the Governor-General with the advice and consent of the Philippine Senate. Judges of all the courts, including the Supreme Court, will under the Commonwealth be named by the President of the Commonwealth with the "consent" (note that "advice" is eliminated) of the Commission on Appointments of the National Assembly.

The independence of the Philippine Judiciary has been sincerely desired by all right-thinking citizens. This objective was partially attained through the appointment of judges for what amounted to life tenures of office and through permitting of removals only after an orderly procedure had been followed. Yet truth compels me to affirm that the judiciary has constantly had to be on the alert to thwart encroachments by the other powers.

Formerly, in Philippine Commission days and even later than that, it was the practice to assign a judge of first instance to try a particular case. The intimation that a certain kind of verdict was wanted was not lost on the judge. Indeed, judges have been bluntly told by special prosecutors that the judge had better hand down the decision desired. It remained for a Filipino jurist, Manuel Araullo, subsequently the Chief Jus-

tice of the Supreme Court, to disprove the belief that the courts of justice could be influenced and to furnish an inspiring example of j udicial rectitude.

Twice, firstly during the Harrison administration, and secondly during the Roosevelt administration, laws were enacted which placed judges below the Supreme Court at the mercy of the appointing power, consisting of the Governor-General acting in cooperation with the Secretary of Justice and the